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Attorneys for Defendants  
SAKHAWAT KHAN and ROOMY KHAN

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

VILMA SERRALTA,  
Plaintiff,  
v.  
SAKHAWAT KHAN; ROOMY KHAN; and  
DOES ONE through TEN, inclusive,  
Defendants.)  
No. C 08-01427 EDL  
)  
)  
**) STIPULATION AND ORDER RE:**  
**) CONFIDENTIALITY OF INFORMATION**  
**) AND DOCUMENTS PRODUCED**  
**) DURING DISCOVERY**  
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)  
[Civ.L.R. 7-12]  
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The parties, through their undersigned counsel, enter into the following stipulation:

WHEREAS, each party recognizes that some of the documents and information which have been and may be produced in this action may include confidential or private information related to the parties or to non-parties;

WHEREAS, the parties wish to facilitate the free exchange of information during the discovery process while at the same time protecting the privacy interests of the parties and non-parties;

1 IT IS HEREBY STIPULATED by the parties as follows:

2 1. All information and documents produced during the discovery process (the  
3 "Information") shall be used for litigation purposes only, and may not be used for any other  
4 purpose whatsoever, including, but not limited to, any business or commercial purpose or for  
5 dissemination to the media or public. Plaintiff and Defendants shall only be permitted to  
6 disclose such Information as follows:

7 a. As may be reasonably necessary for the prosecution of this litigation by  
8 Plaintiff or defense of this litigation by Defendants, including to her or their legal counsel,  
9 consultants, and any others who may be designated as expert witnesses, and their respective  
10 paralegal, secretarial and clerical employees who are assisting in the preparation and trial of this  
11 litigation. Any person given access to the Information shall not make copies, duplicates,  
12 extracts, summaries or descriptions of such material, or any portion thereof except for use in  
13 connection with this litigation, and each such copy, duplicate, extract, summary or description is  
14 to be treated in accordance with the provisions hereof. All such consultants and any others who  
15 may be designated as expert witnesses shall be required to indicate in writing their agreement not  
16 to use or disclose the Information to any other persons, entities or third parties, except as  
17 provided herein;

18 b. At trial, subject to any protections or limitations ordered by the Court,  
19 including *motions in limine* granted by the Court;

20 c. In support of or in opposition to any motions, stipulations, expert reports,  
21 or any other matters or papers that the parties may file in this litigation.

22 DATED: December 19, 2008

By: /s/Matthew Goldberg  
MATTHEW GOLDBERG  
Attorney for Plaintiff

23 DATED: December 19, 2008

By: /s/ Stephen Taeusch  
STEPHEN TAEUSCH  
Attorney for Defendants

1 I, Stephen L. Taeusch, am the ECF User whose identification and password are being  
2 used to file this STIPULATION AND [PROPOSED] ORDER RE: CONFIDENTIALITY OF  
3 INFORMATION AND DOCUMENTS PRODUCED DURING DISCOVERY. In compliance  
4 with General Order 45.X.B, I hereby attest that Matthew Goldberg concurred in this filing.

5  
6 Dated: December 23, 2008

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

7 By: /s/Stephen L. Taeusch  
8 Stephen L. Taeusch

9 *Attorneys for Defendants Sakhawat and Roomy  
Khan*

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## ORDER

Having considered the parties' Stipulation, and good cause appearing,

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: December 23, 2008

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Hon. Claudia Wilken